1 2 3 4	Rachael D. Lamkin (SBN 246066) Karan Singh Dhadialla (SBN 296313) BAKER BOTTS L.L.P. 101 California Street, Suite 3200 San Francisco, California 94111 Phone: (415) 291-6200 Fax: (415) 291-6300 rachael.lamkin@bakerbotts.com karan.dhadialla@bakerbotts.com Attorneys for Defendant NETFLIX, INC.	
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8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10	OAKLAND DIVISION	
11		
12	LAURI VALJAKKA,	Case No.: 4:22-cv-01490-JST
13 14	Plaintiff, v.	DECLARATION OF RACHAEL D. LAMKIN ISO NETFLIX, INC.'S MOTION FOR AN ORDER TO SHOW
15	NETFLIX, INC.,	CAUSE
16	Defendant.	Judge: Hon. Jon S. Tigar Date: January 25, 2024
17		Time: 2:00 p.m. Crtrm: 6 – 2nd Floor
18		
19	I, Rachael D. Lamkin, declare as follows: 1. I am a partner with the law firm of Baker Botts L.L.P. and counsel of record for Defendant Netflix, Inc. in the above-captioned matter. 2. I am admitted to practice in all state and federal courts in California, federal courts in Colorado and the Eastern and Western Districts of Texas. I am also admitted in the Federal Circuit the International Trade Commission, the Court of International Trade, and this Honorable Court. 3. I have personal knowledge of the facts stated herein. 4. I make this Declaration in support of Netflix's Motion for an Order to Show Cause	
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	DECL. OF R. LAMKIN ISO MOTION FOR ORDER TO SHOW C.	AUSE CASE No.: 4:22-CV-01490-JST
I	I DECEMBER AND INTO INTO THE ORDER TO SHOW CA	AUDE 11U., 4.22-C Y-U147U-JO1

- 5. On September 19, 2023, Joe Zito called me to introduce himself and to explain that he would be substituting in for "about 70" of Bill Ramey's cases.
- 6. On or about September 20, 2023, Joe Zito and I spoke again. He said that he would in fact be taking over "about 90" of Bill Ramey's cases.
- 7. Attached as Exhibit A is a true and correct copy of Mr. Valjakka's verified responses to Netflix's CUVTA discovery. Although the document is marked "confidential," upon repeated request, Valjakka would not identify any portions as confidential. On October 30, 2023, I wrote to Valjakka's counsel, "Please respond to my request, sent one week ago. Absent a response, we will assume there is no confidential information in Mr. Valjakka's CUVTA discovery responses. To the extent you disagree, please identify the exact information you believe is confidential and the legal basis for that belief." Lamkin Decl., Exh. E, at 3. Valjakka did not respond.
- 8. Attached as Exhibits B, D, and E are true and correct copies of email threads between myself and various counsel for Valjakka and AiPi.
- 9. Attached as Exhibit C is a true and correct copy of Mr. Valjakka's October 12, 2023 deposition transcript. I have redacted the names of the settling defendants at 49:16-17.
- 10. Attached as Exhibit F is a true and correct copy of *Lado v. Gaynor*, No. 20-56287, 2021U.S. App. LEXIS 1133 (9th Cir. Jan. 14, 2021).

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on this 6th Day of November, 2023 in San Francisco, California.

By: /s/ Rachael D. Lamkin
Rachael D. Lamkin

CASE No.: 4:22-CV-01490-JST